

EXHIBIT A

From: [Kevin Orsini](#)
To: [Rachel Jensen](#)
Cc: [Melissa Syring](#); [Lauren Rosenberg](#); [George Shipley](#); [Dan Drosman](#); [Luke Brooks](#); [Hillary Stakem](#)
Subject: Re: In re: Anadarko Petroleum Corporation Securities Litigation
Date: Wednesday, July 19, 2023 6:51:10 AM

EXTERNAL SENDER

Rachel,

After further consideration, we think it is premature to provide this information at this time as we anticipate filing our petition for a writ of mandamus imminently.

Kevin

Sent from my iPhone

On Jul 18, 2023, at 2:09 PM, Rachel Jensen <RachelJ@rgrdlaw.com> wrote:

Melissa,

We understood from our July 6 call (nearly two weeks ago) that Defendants were sending Plaintiffs a catalogue of documents relating to the AAC investigation. On our July 11 call, and in your email below, Defendants said they would provide the information by last week. That didn't happen. Please send the catalogue today.

Thanks,
Rachel

From: Melissa Syring <msyring@cravath.com>
Sent: Wednesday, July 12, 2023 8:39 PM
To: Rachel Jensen <RachelJ@rgrdlaw.com>; Lauren Rosenberg <lrosenberg@cravath.com>
Cc: George Shipley <gshipley@shipleysnell.com>; Dan Drosman <DanD@rgrdlaw.com>; Luke Brooks <LukeB@rgrdlaw.com>; Hillary Stakem <HStakem@rgrdlaw.com>; Kevin Orsini <Korsini@cravath.com>
Subject: RE: In re: Anadarko Petroleum Corporation Securities Litigation

EXTERNAL SENDER

Rachel,

Thank you for email. Attached are our revisions to the stipulation amending the scheduling order. We are working on the catalogue of Audit Committee investigation documents which we anticipate providing by the end of the week.

Best,
Mel

Melissa A. Syring
Cravath, Swaine & Moore LLP
825 Eighth Avenue | New York, NY 10019
T: (212) 474-1536
msyring@cravath.com

From: Rachel Jensen <RachelJ@rgrdlaw.com>
Sent: Wednesday, July 12, 2023 5:01 PM
To: Lauren Rosenberg <rosenberg@cravath.com>
Cc: George Shipley <gshipley@shipleysnell.com>; Dan Drosman <DanD@rgrdlaw.com>;
Luke Brooks <LukeB@rgrdlaw.com>; Hillary Stakem <HStakem@rgrdlaw.com>; Kevin
Orsini <Korsini@cravath.com>; Melissa Syring <msyring@cravath.com>
Subject: RE: In re: Anadarko Petroleum Corporation Securities Litigation

All,

Thanks for meeting and conferring with us on July 6 and July 11 regarding: (1) the pre-trial schedule (*see* ECF 200), and (2) outstanding documents subject to the Court's March 31 and June 30 orders compelling production of documents (ECFs 173 and 199) (the "MTC Orders").

First, the pre-trial schedule. We understand that Defendants will send any proposed edits to the June 7 draft joint motion and proposed order *by today*. Based on your comments yesterday, we anticipate the need for a follow-up call once we receive the proposed edits.

Second, the outstanding documents. During our July 6 call, Defendants continued to refuse to produce any documents subject to the MTC Orders and indicated further briefing was needed as to whether the MTC Orders encompassed opinion work product. During our July 11 call, you indicated that Defendants now believe opinion work product is covered by the MTC Orders and intend to petition for a writ of mandamus rather than seeking clarification with the Court. Defendants also committed to providing this week a catalogue of documents withheld or redacted in connection with the AAC investigation according to whether the document contains factual information, opinion work product, or both.

We look forward to receiving your proposed edits and list of documents shortly.

Thanks,
Rachel

Rachel L. Jensen

Partner

[<image001.jpg>](#)

655 West Broadway, Suite 1900
San Diego, CA 92101
(619) 231-1058

[<image002.jpg>](#)

[<image002.jpg>](#)

[<image002.jpg>](#)

[<image002.jpg>](#)

[<image002.jpg>](#)

From: Lauren Rosenberg <lrosenberg@cravath.com>

Sent: Wednesday, July 5, 2023 7:11 AM

To: Rachel Jensen <RachelJ@rgrdlaw.com>

Cc: George Shipley <gshipley@shipleysnell.com>; Dan Drosman <DanD@rgrdlaw.com>;
Luke Brooks <LukeB@rgrdlaw.com>; Hillary Stakem <HStakem@rgrdlaw.com>; Kevin
Orsini <Korsini@cravath.com>; Melissa Syring <msyring@cravath.com>

Subject: Re: In re: Anadarko Petroleum Corporation Securities Litigation

EXTERNAL SENDER

Rachel,

We are available tomorrow at 3 pm ET/12 pm PT.

Thanks,

Lauren

Lauren Rosenberg
Cravath Swaine & Moore LLP
825 Eighth Avenue
New York, NY 10019
212-474-1159

On Jun 30, 2023, at 7:06 PM, Rachel Jensen <RachelJ@rgrdlaw.com> wrote:

Lauren and George – as an addendum to my last email, let's plan on meeting and conferring about the outstanding documents on next week's call as well.

Thanks,

Rachel

From: Rachel Jensen

Sent: Friday, June 30, 2023 3:35 PM

To: 'Lauren Rosenberg' <lrosenberg@cravath.com>; George Shipley <gshipley@shipleysnell.com>

Cc: Dan Drosman <DanD@rgrdlaw.com>; Luke Brooks <LukeB@rgrdlaw.com>; Hillary Stakem <HStakem@rgrdlaw.com>

Subject: In re: Anadarko Petroleum Corporation Securities Litigation

Lauren and George:

In light of the Court's order earlier today (ECF 200), please advise when Defendants are available to meet and confer next Wednesday or Thursday afternoon (pacific time) about modifying the scheduling order.

Have a good weekend.

Rachel

Rachel L. Jensen

Partner

[<image001.jpg>](#)

655 West Broadway, Suite 1900
San Diego, CA 92101
(619) 231-1058

[<image002.jpg>](#)

[<image002.jpg>](#)

[<image002.jpg>](#)

[<image002.jpg>](#)

[<image002.jpg>](#)

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain information that is confidential and protected from disclosure by the attorney-client privilege, as attorney work product, or by other applicable privileges. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This e-mail is confidential and may be privileged. Use or disclosure of it by anyone other than a designated addressee is unauthorized. If you are not an

intended recipient, please delete this e-mail from the computer on which you received it.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain information that is confidential and protected from disclosure by the attorney-client privilege, as attorney work product, or by other applicable privileges. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This e-mail is confidential and may be privileged. Use or disclosure of it by anyone other than a designated addressee is unauthorized. If you are not an intended recipient, please delete this e-mail from the computer on which you received it.

NOTICE: This email message is for the sole use of the intended recipient(s) and may contain information that is confidential and protected from disclosure by the attorney-client privilege, as attorney work product, or by other applicable privileges. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.

This e-mail is confidential and may be privileged. Use or disclosure of it by anyone other than a designated addressee is unauthorized. If you are not an intended recipient, please delete this e-mail from the computer on which you received it.